

DAVID B. GOLUBCHIK (SBN 185520)
ROBERT M. CARRASCO (SBN 334642)
LEVENE, NEALE, BENDER,
YOO & GOLUBCHIK L.L.P.
2818 La Cienega Avenue
Los Angeles, California 90034
Telephone: (310) 229-1234;
Facsimile: (310) 229-1244
Email: DBG@LNBYG.COM; RMC@LNBYG.COM

Proposed Counsel for Chapter 11 Debtors
and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
SANTA ANA DIVISION**

In re:

Bright Care Veterinary Hospital, Inc.,

Debtor and Debtor in Possession.

In re:

Bright Care Veterinary Group, Inc.

Debtor and Debtor in Possession.

- ☒ Affects both Debtors
- ☐ Affects Bright Care Veterinary
Hospital, Inc. only
- ☐ Affects Bright Care Veterinary Group,
Inc. only

Proposed Lead Case No.: 8:25-bk-10900
Jointly administration sought with Bright Care
Veterinary Group Inc. (8:25-bk-10902)

Chapter 11 Cases

**OMNIBUS DECLARATION OF ALIREZA
GORGI IN SUPPORT OF EMERGENCY
MOTIONS**

Hearing:

Date: April 10, 2025

Time: 9:30 a.m.

Place: Courtroom 5C

411 West Fourth Street

Santa Ana, CA 92701

Hearing to be held in-person and by video-
conference Government Zoom

DECLARATION OF ALIREZA GORGI

I, Alireza Gorgi, declare as follows:

1. I am the Chief Executive Officer of Bright Care Veterinary Hospital, Inc. (the “Debtor” or “Bright Care Hospital”), the debtor and debtor in possession in the above-referenced Chapter 11 bankruptcy case, and Bright Care Veterinary Group, Inc. (its “Affiliate” or “Bright Care Group”, and, together with Debtor, the “Debtors”).

2. I file this declaration in support of the following concurrently filed motions: (1) Emergency Motion For Order: (i) Authorizing Interim Use Of Cash Collateral Pursuant To Section 363 Of The Bankruptcy Code And Related Relief; and (ii) Setting A Final Hearing (the “Cash Collateral Motion”); and (2) Debtors’ Emergency Motion For Order Authorizing Debtors To: (i) Pay Prepetition Priority Wages; and (ii) Honor Accrued Vacation And Leave Benefits In The Ordinary Course Of Business (the “Priority Wage Motion”). Unless indicated otherwise, the statements made herein are of my own personal knowledge, and if called upon, I would and could competently testify to their truth.

3. Each of the Debtors filed a voluntary petition under Chapter 11 of 11 U.S.C. §§ 101 *et seq.* (the “Bankruptcy Code”) on April 8, 2025 (the “Petition Date”). Since the Petition Date, the Debtors have been operating their businesses and managing their affairs as debtors-in-possession pursuant to Sections 1107 and 1108 of the Bankruptcy Code.

A. Background

4. Bright Care Hospital¹ provides emergency veterinary services at 1400 N Burton Pl, Anaheim, CA 92806 (the “Anaheim Property”). Bright Care Group is a veterinary clinic that provides services at 26012 Marguerite Pkwy, Suite 0, Mission Viejo, CA 92692 (the “Mission Viejo Property”). Bright Care Group provides the equipment, experience, and treatment that animal patients can’t get anywhere else for neurological disorders of the brain, spinal cord, and nervous system. Indeed, both businesses work tirelessly to ensure that animals are provided the same quality of life and treatment that is given to humans.

¹ DBA California Animal Specialty and Emergency-Case.

1 5. I am the 100% shareholder of Bright Care Hospital and Bright Care Group and
2 manage the businesses.

3 6. I am a board certified neurologist and neurosurgeon that has been practicing
4 veterinary neurology and neurosurgery in Southern California for over 10 years. I am known to
5 be progressive, integrative, compassionate, and strive to remain at the forefront of all available
6 modalities to treat different neurologic and neurosurgical diseases. I am also an adjunct clinical
7 professor at Western University of Medical Sciences in Pomona, CA.

8 7. Bright Care Group was started in Mission Viejo in 2018 to meet the demands of
9 the pet population and their owners in the Mission Viejo area. The practice was a success and in
10 2019 Bright Care Group was named one of the most valuable new businesses in Mission Viejo
11 and received the “KEY” to the city by the mayor of Mission Viejo. In 2023 I opened Bright
12 Care Hospital in Anaheim, CA to meet the community’s needs for Specialty Veterinary care in
13 North Orange County.

14 **B. Financing and Secured Debt**

15 8. The Debtors are primarily service providers, providing veterinary services to the
16 public. The Debtors do not own any real properties. Moreover, the Debtors’ inventory of
17 medicine, medical supplies and related items is relatively minimal. The most valuable assets of
18 the Debtors are their equipment used in connection with their veterinary practices. Finally,
19 because the Debtors receive payments at time that services are rendered, the Debtors do not
20 generate accounts receivable.

21 9. As of the Petition Date, the Debtors’ assets have a value of less than \$1,000,000
22 as follows:

- 23 a. Cash (including restricted cash subject to MCA Lender freezes): \$310,000;
24 b. Inventory: \$50,000; and
25 c. FF&E: \$600,000.

26 **C. Financing and Secured Debt**

1 10. In 2021, Bright Care Group borrowed approximately \$5,000,000 from Live Oak
2 Banking Company ("Live Oak") for the purchase and construction of the Anaheim Property.
3 The Anaheim Property is owned by Debtors' affiliate, 1400 Burton LLC, and was last appraised
4 at \$4,750,000. The Debtors are guarantors of the foregoing financing and have pledged their
5 assets to secure the obligation owed to Live Oak.

6 11. The Debtors entered into a second loan (for \$900,000) with Live Oak in 2023 to
7 provide working capital and medical equipment purchases. Finally, the Debtors entered into a
8 third loan (for \$1,800,00) with Live Oak to purchase property in Palm Desert, California for the
9 construction of an additional veterinary hospital. As of the Petition Date, the total amount owed
10 to Live Oak is approximately \$7,528,611.75. In exchange for the loans, the Debtors have
11 pledged substantially all of their assets to Live Oak.

12 12. In 2021, Bright Care Veterinary Group borrowed approximately \$2,135,000 and
13 \$650,000 from Bank of America to refinance a separate loan from Live Oak (separate from the
14 three (3) discussed above) to expand/construct an additional suite for the Anaheim Property. In
15 exchange for the loan, Bright Care Veterinary Group pledged substantially all of its assets to
16 Bank of America. Live Oak and Bank of America timely filed and recorded UCC-1 liens to
17 perfect their respective security interests.

18 13. While the businesses generated substantial revenue, rising costs in goods,
19 construction, and payroll as a result of the Covid-19 pandemic forced the Debtors to take out
20 additional loans.

21 14. Over the past two years, the Debtors have obtained several short-term loans and
22 merchant cash advances from over fourteen lenders ("MCA Lenders") who advance funds and
23 then electronically sweep credit card charges to collect their payments. All of the loans with the
24 MCA Lenders are subject to onerous interest rates (in some cases, in excess of 700% per
25 annum) that have crippled the Debtors' business. Due to sporadic and incomplete accounting
26 form the MCA Lenders, the Debtors do not have definitive figures for the outstanding
27 obligations, but believe that the aggregate amounts owed to the MCA Lender are in excess of
28

\$2,000,000. Thus, while the Debtors are relatively profitable², the Debtors' cash flows are not sufficient to service Live Oak, Bank of America, and the MCA Lenders.

D. Reason For Bankruptcy Filing

15. The bankruptcy filings were predicated by actions taken by the MCA Lenders. Prior to the Petition Date, the MCA Lenders sent notices to the Debtors' banks at Wells Fargo, Bank of America and their merchant credit card processors PaySafe North America and Care Credit (collectively, the "Payors") and had the Debtors' accounts frozen. With their accounts frozen, the Debtors are unable to operate their businesses. The Debtor believes that approximately \$310,000 in funds are currently available but frozen as a result of MCA Lender's actions. Without access to funds, the Debtors are unable to operate and keep their doors open to generate additional revenue for the benefit of all creditors.

16. Due to the foregoing actions by the MCA Lenders, the Debtors were forced to file for chapter 11 relief on an emergency basis. The Debtors have determined that it is in the best interests of the Debtors' businesses to file these cases to preserve the going-concern value of their businesses and save the jobs of their approximately 118 employees. The Debtors intend to propose a plan in good faith to reorganize their financial affairs, repay their creditors, and avoid a senseless and unnecessary liquidation.

E Motion For Use Of Cash Collateral.

17. The Debtors seek the Court's approval authorizing use of cash collateral in order to pay the expenses of maintaining and operating their businesses as a going concern, as set forth in the annexed 13-week cash flow budget (the "Budget"), annexed hereto as **Exhibit 1**.

18. The Debtors' primary lender is Live Oak and Live Oak remains first in priority on the Debtors' assets. Bank of America is second in priority in the Debtors' accounts receivable followed by the Debtors' known fourteen MCA Lenders: who are subordinate to

² Bright Care Group's Gross Revenue in 2024: \$6,536,755.42; Gross Revenue in 2023: \$7,680,420.09. Bright Care Hospital's Gross Revenue in 2024: \$9,669,586.84; Gross Revenue in 2023: \$3,785,478.37.

1 Live Oak's secured lien as to the assets of the Debtors.³ Although the Debtors' operations are
2 profitable, the Debtors' cash flows are not sufficient to service Live Oak, Bank of America, the
3 MCA Lenders. The Debtors are also unable to determine the priority of the MCA Lenders
4 because all of the MCA Lenders (with the exception of Funding Futures LLC, Daytona
5 Funding, and JRG Funding LLC) used a separate third-party service company to file a UCC-1
6 Financing Statement. The UCC-1 Financing Statement lists the secured creditor as the corporate
7 services company and does not disclose the name of the MCA Lender.⁴ The result of this
8 approach taken by the MCA Lenders creates confusion as there appear to be duplicate UCC-1
9 filings filed by the corporation services companies. I believe that the order of priority of
10 secured creditors is listed below.

11 ///

24 ³ Merchant cash advance agreements are often fashioned as a purchase of accounts receivable. The
25 Debtors reserve the right to submit supplemental briefing as requested by the Court to determine the
26 nature of these MCAs; however, for purposes of this Motion, Debtors are not distinguishing between
advances secured by accounts receivable and a purchase of such receivables. Both are "interests" in cash
collateral, for purposes of Section 11 U.S.C. § 363(c).

27 ⁴ The UCC-1 Filing Statements are voluminous. As an example, attached as Exhibit 2 is the most recent
28 UCC-1 filed by a third party service company, Corporation Service Company, as Representative,
asserting a security interest the accounts receivable of Bright Care Hospital.

Creditor	Number and Date	Priority	Collateral
LIVE OAK BANKING COMPANY	U210034707626 Filed- 3/31/2021 Lapse – 3/31/26	1st	All Assets
BANK OF AMERICA, N.A.,	U210022232118 Filed - 3/31/21 Lapse -3/31/26	2nd	Accounts Receivable
LIVE OAK BANKING COMPANY	U230060062720 Filed – 8/24/23 Lapse – 8/24/28	3 rd	All Assets.
LAUNCH FUNDING GROUP LLC	U240046621627 Filed – 8/24/23 Lapse – 8/24/28	4th	Accounts Receivable
CORPORATION SERVICE COMPANY, AS REPRESENTATIVE,	U230091099432 Filed – 12/28/23 Lapse – 12/28/28	5 th	All accounts Receivable
C T CORPORATION SYSTEM, AS REPRESENTATIVE,	U240015419429 Filed – 2/12/24 Lapse – 2/12/29	6th	Accounts Receivable
C T CORPORATION SYSTEM	U240021034925 Filed – 2/27/24 Lapse – 2/27/29	7th	Accounts Receivable
C C REPRESENTATIVE	U240071567018 Filed – 9/12/24 Lapse – 9/12/29	8th	Accounts Receivable
FUNDING FUTURES LLC	U240088126729 Filed – 11/14/24 Lapse – 11/14/29	9th	Accounts Receivable
C T CORPORATION SYSTEM, AS REPRESENTATIVE,	U240089779138 Filed – 11/20/24 Lapse – 11/20/29	10th	Accounts Receivable
C T CORPORATION SYSTEM, AS REPRESENTATIVE	U250101493530 Filed – 11/20/24 Lapse – 11/20/29	11th	Accounts Receivable
THORO CORP	U240092549328 Filed – 12/3/24 Lapse – 12/3/29	12th	All accounts and accounts receivable.
DAYTONA FUNDING SOLUTIONS	U240094134935 Filed – 12/9/24 Lapse – 12/9/29	13th	All accounts and accounts receivable.
THORO CORP	U250103877528 Filed – 1/16/25 Lapse – 1/16/30	14th	All accounts and accounts receivable.
JRG FUNDING LLC	U250104825318 Filed – 1/21/25 Lapse – 1/21/30	15th	Accounts receivable
VSTATE FILINGS AS THE REPRESENTATIVE,	U250105219727 Filed – 1/22/25 Lapse – 1/22/30	16 th	Accounts Receivable.
C T CORPORATION SYSTEM, AS REPRESENTATIVE,	U250105235519 Filed – 1/22/25 Lapse – 1/22/30	17 th	Accounts Receivable
CORPORATION SERVICE COMPANY	U250108364231 Filed – 2/4/25 Lapse – 2/4/30	18 th	Accounts Receivable

19. This bankruptcy filing was precipitated by the purported MCA Lenders freezing the Debtors' accounts with their Payors.

20. In the ordinary course of its business, we accept credit card payments from the Debtors' customers for the sale of their products and veterinary services. The Debtors maintain the following bank accounts and merchant collection accounts that are now frozen due to the MCA Lenders' actions.

Debtor	Account # (last 4 digits)	Bank/Merchant Processor Name
Bright Care Group	x9527	Wells Fargo
Bright Care Group	x4292	Wells Fargo
Bright Care Hospital	x9501	Wells Fargo
Bright Care Hospital	x3784	Wells Fargo
Bright Care Hospital	x4300	Wells Fargo
Bright Care Group	x2667	Bank of America
Bright Care Hospital	x3879	Bank of America
Bright Care Group	x7246	PaySafe North America
Bright Care Group	x8350	PaySafe North America
Bright Care Group	x3027	Care Credit

21. I understand that the amount frozen in the Debtors' accounts is approximately \$310,000, with a majority of the funds (\$297,354) frozen in PaySafe North America and Care Credit. This amount changes daily and will likely be higher by the time of the hearing. Without emergency authorization to use cash collateral and instruction to release such frozen funds, I am confident that the Debtors will not be able to make their next payroll due on April 11, 2024. Failure to fund payroll will likely result in much of their crucial retail labor force to seek employment elsewhere, draining valuable human resources. Having to replace and retrain new employees would be an immediately and costly disruption in the Debtors' business operations.

1 22. Due to the Debtors' nearly complete dependence on credit card sales proceeds
2 for their operating cash flow, I hereby request that, apart from authorization to use cash
3 collateral, the Court authorizes and instructs the Payors to immediately release all funds being
4 withheld and commence payments to the Debtors pursuant to their credit card servicing
5 agreements so that the Debtors can pay their ordinary and necessary costs of operations.

6 23. Due to the foregoing, I believe that the Debtors have an exigent and compelling
7 need to use cash in which their purportedly secured creditors assert a collateral interest. The
8 only source of revenue available to the Debtors to operate their businesses, and to maintain,
9 preserve, and grow the value of the company is from the sale of its well-regarded services.

10 24. I believe that the Debtors cannot continue to operate, preserve and grow the
11 going-concern value of their businesses for the benefit of all creditors unless the Debtors have
12 immediate and continuing use of their cash to pay their ordinary operating expenses. The
13 Debtors' inability to pay their operating expenses in the ordinary course of their business would
14 cause immediate and irreparable harm to the Debtors, creditors, and all stakeholders. Given the
15 Debtors' current ability to operate profitably, as shown by the Budget, I believe that the use of
16 cash collateral is certainly critical to avoid an unwarranted end to the Debtors' businesses,
17 causing approximately 118 employees to be terminated.

18 25. To keep the Debtors operating through their reorganization, the Debtors require
19 the use of cash collateral consistent with the Budget, a true and correct copy of which is
20 annexed hereto as **Exhibit 1**. I was intimately involved in analyzing the Debtors' finances and
21 preparing the Budget. The Budget reflects the Debtors' ordinary and necessary operating
22 expenses that must be paid post-petition to preserve the Debtors' businesses. While the Budget
23 represents the Debtors' best estimates of such expenses, the needs of the businesses may
24 fluctuate. Thus, I respectfully seek authority to deviate from the total expenses contained in the
25 Budget by no more than 15%, on a cumulative basis, and to deviate by category (provided the
26 Debtors do not pay expenses outside any of the categories) without the need for further Court
27 order.

1 26. If the Debtors are not permitted to use their cash collateral to maintain and
2 operate their businesses, I believe that the Debtors will be unable to operate or pay their
3 employees, and the enterprise value of the businesses will be lost along with any meaningful
4 chance of recovery by creditors.

5 27. I believe that all secured creditors are adequately protected by use of cash
6 collateral. While the value of the assets is insufficient to provide adequate protection, provided
7 that the Debtors are going concern, I believe that the value of their assets, as discussed above,
8 will be relatively stable. Of course, in the event of a liquidation, the inventory and FF&E would
9 likely be sold for pennies on the dollar, thereby depleting and value for the creditors.

10 28. In addition, because the Debtors are primarily service-oriented businesses, the
11 maximum value can only be achieved if services are provided as going concern. If the Debtors
12 are permitted to operate, they will be able to generate cash flow for the benefit of creditors and
13 other constituents.

14 29. Finally, I have commenced discussions with third parties to either invest in, or
15 purchase a percentage of, the Debtors' businesses. In the event of such infusion of funds, the
16 creditors will benefit by stronger and healthier Debtors that would improve recovery for the
17 benefit of all constituents.

18 **F. Motion to Pay Pre-Petition Payroll**

19 30. Bright Care Hospital employs approximately 76 employees and Bright Care
20 Group employs approximately 42 employees (collectively referred to herein as "employees").

21 31. The Debtors provide their full-time employees with comprehensive benefits,
22 including paid time off, holidays, medical, dental and vision benefits, and 401k retirement plan.
23 All of the foregoing in this paragraph referred to herein as "Benefits".

24 32. To manage cash flow, the Debtors pay their employees on alternating biweekly
25 payroll schedules. The Debtors maintain a third-party payroll service, Barret Business Services,
26 Inc. ("BBSI"), to help manage payroll. BBSI is funded on the Thursday prior to payroll being
27 issued on the Friday pay date.

33. Bright Care Hospital's next payroll is due on April 11, 2025, and will include a prepetition stub period of March 24 to April 6, 2025. The total Prepetition Payroll and Benefits for the prepetition stub period total \$236,724. Bright care Hospital also requests authority to pay for the small prepetition wages accrued on April 7, 2025 which will be a part of the subsequent payroll period and will cover April 7 – April 20, 2025. The estimated amount for wages incurred on April 7, 2025 is approximately \$16,908.85. This \$16,908.85 amount is not due until April 24, 2025.

34. The amounts for the Prepetition Payroll and Benefits do not exceed \$15,150 per employee.

35. Bright Care Veterinary's next payroll is due on April 18, 2025 and will cover March 31 to April 13, 2025. This payroll period contains a prepetition stub period of March 31 to April 7, 2025. The total Prepetition Payroll and Benefits for the prepetition stub period total \$67,167.

36. All of the employees to which the Debtors seek to pay Prepetition Payroll and honor Benefits for the prepetition period are still employed by the Debtors. I believe that approval to honor the Prepetition Payroll and Benefits for the Prepetition Period, including all federal and state withholding taxes, payroll taxes, employer 401(k) contributions, and payroll service fees, will not render the estates administratively insolvent (as the Debtors have approximately \$310,000 in cash). I believe that the Debtors' employees are integral to the Debtors' continued operations and the generation of revenue, while preserving the value of the estates. In short, I am confident that the Debtors cannot continue to operate and reorganize without the employees. If the Debtors fail to pay their employees their ordinary and earned wages, and salaries, I believe that the employees will likely quit. Without employees, the Debtors' operations and the value of their businesses will be eviscerated altogether.

37. The source of the funds to be used to pay the Prepetition Payroll will be the Debtors' available cash and revenue. I believe that the payment of the Prepetition Payroll requested herein will not render the Debtors' bankruptcy estates administratively insolvent.

38. The employees to be paid pursuant to the Motion are summarized in **Exhibit 3** hereto.

39. The source of the funds to be used to pay the Payroll will be the Debtors' available cash and revenue as set forth in the Budget.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 8th day of April, 2025 in Mission Viejo, California.

Alireza Gorgi, Declarant

EXHIBIT 1

Right Care Veterinary Group Cash Flow Projection

		1	2	3	4	5	6	7	8	9	10	11	12	13
	Average Monthly	Wk ending 4/13	Wk ending 4/20	Wk ending 4/27	Wk ending 5/4	Wk ending 5/11	Wk ending 5/18	Wk ending 5/25	Wk ending 6/1	Wk ending 6/8	Wk ending 6/15	Wk ending 6/22	Wk ending 6/29	Wk ending 7/6
INCOME														
Veterinary Services	\$456,500.00	106,162	106,162	106,162	106,162	106,162	106,162	106,162	106,162	106,162	106,162	106,162	106,162	106,162
EXPENSES														
Payroll	\$260,000.00	0	145,000	0	115,000	0	145,000	0	115,000	0	145,000	0	115,000	0
Supplies	\$25,000.00	12,500	0	12,500	0	12,500	0	12,500	0	12,500	0	12,500	0	12,500
Insurance	\$10,000.00	0	0	0	10,000	0	0	0	10,000	0	0	0	10,000	0
Tucker (MRI reading Radiologist services)	\$5,750.00	0	0	0	5500	0	0	0	5500	0	0	0	5500	0
Antech (Radiologist and Lab services)	\$15,000.00	3750	3750	3750	3750	3750	3750	3750	3750	3750	3750	3750	3750	3750
Idexx (lab services)	\$24,000.00	6000	6000	6000	6000	6000	6000	6000	6000	6000	6000	6000	6000	6000
MRI and CT Maintenance	\$6,750.00	0	6750	0	0	0	6750	0	0	0	6750	0	0	0
Airgas (Oxygen and medical nitrogen)	\$3,000.00	0	3000	0	0	0	3000	0	0	0	3000	0	0	0
Utilities and Internet	\$10,750.00	0	0	10,750	0	0	0	10,750	0	0	0	10,750	0	0
Professional Fees & Costs	\$20,000.00	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000
Monthly Rent	\$34,599.00	0	0	0	34,599	0	0	0	34,599	0	0	0	34,599	0
Misc	\$16,000.00	4000	4000	4000	4000	4000	4000	4000	4000	4000	4000	4000	4000	4000
Total Expenses	\$430,849.00	\$31,250	\$173,500	\$42,000	\$183,849	\$31,250	\$173,500	\$42,000	\$183,849	\$31,250	\$173,500	\$42,000	\$183,849	\$31,250
NET INCOME/LOSS	\$25,651.00	\$74,912	(\$67,338)	\$64,162	-77,687	\$74,912	(\$67,338)	\$64,162	(\$77,687)	\$74,912	-67,338	\$64,162	(\$77,687)	\$74,912
Asset Analysis:														
Starting cash	\$20,000	94,912	94,912	27,574	\$91,736	14,049	\$88,961	21,623	85,785	8,098	\$83,010	15,672	\$79,834	\$2,147
Change in cash	74,912	-67,338	-67,338	\$64,162	-77,687	74,912	-67,338	\$64,162	(\$77,687)	\$74,912	(\$67,338)	\$64,162	77,687	\$74,912
Ending Cash	94,912	27,574	27,574	\$91,736	\$14,049	\$88,961	\$21,623	\$85,785	\$8,098	\$83,010	\$15,672	\$79,834	2,147	77,059
Starting AR														
Change in AR														
Ending AR														
Inventory		\$35,000	\$35,000	\$35,000	\$35,000	\$35,000	\$35,000	\$35,000	\$35,000	\$35,000	\$35,000	\$35,000	\$35,000	\$35,000
FF&E		\$400,000	\$400,000	\$400,000	\$400,000	\$400,000	\$400,000	\$400,000	\$400,000	\$400,000	\$400,000	\$400,000	\$400,000	\$400,000
TOTAL ASSETS:		529,912	462,574	\$526,736	\$449,049	\$523,961	\$456,623	\$520,785	\$443,098	\$518,010	\$450,672	\$514,834	437,147	\$512,059

are Veterinary Hospital (dba CASE) Cash Flow Projection

		1	2	3	4	5	6	7	8	9	10	11	12	13
	Average Monthly	Wk ending 4/13	Wk ending 4/20	Wk ending 4/27	Wk ending 5/4	Wk ending 5/11	Wk ending 5/18	Wk ending 5/25	Wk ending 6/1	Wk ending 6/8	Wk ending 6/15	Wk ending 6/22	Wk ending 6/29	Wk ending 7/6
INCOME														
Veterinary Services	\$678,656.00	158,000	158,000	158,000	158,000	158,000	158,000	158,000	158,000	158,000	158,000	158,000	158,000	158,000
EXPENSES														
Payroll	-\$480,500.00	220,500	0	260,000	0	220,500	0	260,000	0	220,500	0	260,000	0	220,500
Supplies	-\$40,000.00	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000
Insurance	-\$12,500.00	0	0	0	12,500	0	0	0	12,500	0	0	0	12,500	0
Tucker (MRI reading Radiologist services)	-\$5,500.00	0	0	0	5500	0	0	0	5500	0	0	0	5500	0
Antech (Radiologist and Lab services)	\$30,000.00	7500	7500	7500	7500	7500	7500	7500	7500	7500	7500	7500	7500	7500
Idexx (lab services)	-\$29,000.00	7250	7250	7250	7250	7250	7250	7250	7250	7250	7250	7250	7250	7250
MRI and CT Maintenance	-\$9,750.00	0	9750	0	0	0	9750	0	0	0	9750	0	0	0
Airgas (Oxygen and medical nitrogen)	-\$750.00	0	750	0	0	0	750	0	0	0	750	0	0	0
Utilities and Internet	-\$13,500.00	6750	0	6750	0	6750	0	6750	0	6750	0	6750	0	6750
Professional Fees & Costs	\$20,000.00	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000
Misc	-\$17,500.00	4375	4375	4375	4375	4375	4375	4375	4375	4375	4375	4375	4375	4375
Total Expenses	-\$559,000.00	\$261,375	\$44,625	\$300,875	\$55,125	\$246,625	\$44,625	\$300,875	\$55,125	\$246,625	\$44,625	\$300,875	\$55,125	\$246,625
NET INCOME/LOSS	\$119,656.00	(\$107,875)	\$113,375	(\$142,875)	102,875	(\$88,625)	\$113,375	(\$142,875)	\$102,875	(\$88,625)	113,375	(\$142,875)	\$102,875	(\$88,625)
<u>Asset Analysis:</u>														
Starting cash		\$310,000	202,125	315,500	\$172,625	275,500	\$186,875	300,250	157,375	260,250	\$171,625	285,000	\$142,125	\$245,000
Change in cash		-107,875	113,375	(\$142,875)	102,875	-88,625	113,375	(\$142,875)	\$102,875	(\$88,625)	\$113,375	(\$142,875)	102,875	(\$88,625)
Ending Cash		202,125	315,500	\$172,625	\$275,500	\$186,875	\$300,250	\$157,375	\$260,250	\$171,625	\$285,000	\$142,125	245,000	156,375
Starting AR														
Change in AR														
Ending AR														
Inventory		\$50,000	\$50,000	\$50,000	\$50,000	\$50,000	\$50,000	\$50,000	\$50,000	\$50,000	\$50,000	\$50,000	\$50,000	\$50,000
FF&E		\$600,000	\$600,000	\$600,000	\$600,000	\$600,000	\$600,000	\$600,000	\$600,000	\$600,000	\$600,000	\$600,000	\$600,000	\$600,000
TOTAL ASSETS:		852,125	965,500	\$822,625	\$925,500	\$836,875	\$950,250	\$807,375	\$910,250	\$821,625	\$935,000	\$792,125	895,000	806,375

EXHIBIT 2



STATE OF CALIFORNIA
Office of the Secretary of State
UCC FINANCING STATEMENT (UCC 1)

California Secretary of State
1500 11th Street
Sacramento, California 95814
(916) 657-5448

For Office Use Only

-FILED-

File No.: U250108364231

Date Filed: 2/4/2025

Submitter Information: Contact Name: CORPORATION SERVICE COMPANY Organization Name: CORPORATION SERVICE COMPANY Phone Number: 18008585294 Email Address: SPRFiling@cscglobal.com Address: 801 ADLAI STEVENSON DR SPRINGFIELD, IL 62703					
Debtor Information: <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="width: 50%; padding: 5px;">Debtor Name</th> <th style="width: 50%; padding: 5px;">Mailing Address</th> </tr> <tr> <td style="padding: 5px;">BRIGHT CARE VETERINARY HOSPITAL, INC.</td> <td style="padding: 5px;">1400 NORTH BURTON PLACE ANAHEIM, CA 92806</td> </tr> </table>		Debtor Name	Mailing Address	BRIGHT CARE VETERINARY HOSPITAL, INC.	1400 NORTH BURTON PLACE ANAHEIM, CA 92806
Debtor Name	Mailing Address				
BRIGHT CARE VETERINARY HOSPITAL, INC.	1400 NORTH BURTON PLACE ANAHEIM, CA 92806				
Secured Party Information: <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="width: 50%; padding: 5px;">Secured Party Name</th> <th style="width: 50%; padding: 5px;">Mailing Address</th> </tr> <tr> <td style="padding: 5px;">CORPORATION SERVICE COMPANY, AS REPRESENTATIVE</td> <td style="padding: 5px;">PO BOX 2576 SPRINGFIELD, IL 62708</td> </tr> </table>		Secured Party Name	Mailing Address	CORPORATION SERVICE COMPANY, AS REPRESENTATIVE	PO BOX 2576 SPRINGFIELD, IL 62708
Secured Party Name	Mailing Address				
CORPORATION SERVICE COMPANY, AS REPRESENTATIVE	PO BOX 2576 SPRINGFIELD, IL 62708				
Indicate how documentation of Collateral is provided: Entered as Text					
Description: <p>"All Assets that Borrower now owns or hereafter acquires and wherever located, including without limitation:</p> <ul style="list-style-type: none"> (i) any and all amounts owing to Borrower now or in the future from any merchant processor(s) processing charges made by customers of Borrower via credit card, debit card or Electronic Benefit Transfer transactions; and (ii) all other tangible and intangible personal property, including, but not limited to (a) inventory, (b) equipment, (c) investment property, including certificated and uncertificated securities, securities accounts, security entitlements, commodity contracts and commodity accounts, (d) instruments, including promissory notes (e) chattel paper, including tangible chattel paper and electronic chattel paper, (f) documents, (g) letter of credit rights, (h) accounts, including health-care insurance receivables, (i) deposit accounts, (j) commercial tort claims, (k) general intangibles, including payment intangibles and software and (l) as-extracted collateral as such terms may from time to time be defined in the Uniform Commercial Code. The security interest Borrower grants includes all accessions, parts, supplies and replacements for the Collateral, all products, proceeds and collections thereof and all records and data relating thereto. <p>Borrower is prohibited from pledging or selling any receivables owing to Borrower now or in the future to any person or entity other than Secured Party."</p> <p>The secured party named in this record is acting in a representative capacity for purposes of forwarding notices & inquiries regarding this record. For more information, please contact the secured party at the address listed above or at [UCCSPREP@CSCINFO.COM].</p>					
Indicate if Collateral is held in a Trust or is being administered by a Decedent's Personal Representative: Not Applicable					
Select an alternate Financing Statement type:					
Select an additional alternate Financing Statement type:					
Select an alternative Debtor/Secured Party designation for this Financing Statement:					
Optional Filer Reference Information: 3037 98484					

EXHIBIT 3

Bright Care Veterinary Hospital Inc.

EMPLOYEE NAME	Title	Location	By- Weekly (Salary Rate)	Hourly Rate	Wages Due at next payroll	Commissions /Bonuses(if any)	Expenses (if any)
	CSR Manager	Bright Care Veterinary Hospital Inc.	\$2,884.60	N/A	\$2,884.61	N/A	
	Doctor Assistant	Bright Care Veterinary Hospital Inc.		\$32.00	\$1,960.80	N/A	
	RVT	Bright Care Veterinary Hospital Inc.		\$35.00	\$1,909.43	N/A	
	CSR	Bright Care Veterinary Hospital Inc.		\$23.00	\$1,930.74	N/A	
	Custodial	Bright Care Veterinary Hospital Inc.		\$19.00	\$1,524.47	N/A	
	RVT	Bright Care Veterinary Hospital Inc.		\$30.50	\$2,378.00	N/A	
	Veterinary Assistant	Bright Care Veterinary Hospital Inc.		\$30.00	\$2,527.91	N/A	
	RVT	Bright Care Veterinary Hospital Inc.		\$28.00	\$0.00	N/A	
	CSR	Bright Care Veterinary Hospital Inc.		\$27.50	\$2,260.99	N/A	
	Veterinary Assistant	Bright Care Veterinary Hospital Inc.		\$25.00	\$2,026.00	N/A	
	Veterinary Assistant	Bright Care Veterinary Hospital Inc.		\$28.00	\$1,727.94	N/A	
	Veterinary Assistant	Bright Care Veterinary Hospital Inc.		\$26.00	\$384.80	N/A	
	Doctor Assistant	Bright Care Veterinary Hospital Inc.		\$28.00	\$2,327.18	N/A	
	RVT	Bright Care Veterinary Hospital Inc.		\$39.00	\$1,654.58	N/A	
	Veterinary Assistant	Bright Care Veterinary Hospital Inc.		\$35.00	\$2,798.09	N/A	
	Emergency DVM	Bright Care Veterinary Hospital Inc.	\$9,423.07	N/A	\$9,423.08	N/A	
	RVT	Bright Care Veterinary Hospital Inc.		\$32.00	\$2,226.74	N/A	
	Interim Financial Coordinator	Bright Care Veterinary Hospital Inc.	\$192.30	N/A	\$192.30	N/A	
	Veterinary Assistant	Bright Care Veterinary Hospital Inc.		\$21.00	\$1,783.95	N/A	
	Veterinary Assistant	Bright Care Veterinary Hospital Inc.		\$24.00	\$1,390.23	N/A	
	Doctor Assistant	Bright Care Veterinary Hospital Inc.		\$27.00	\$708.57	N/A	
	CSR	Bright Care Veterinary Hospital Inc.		\$24.00	\$479.28	N/A	
	CSR	Bright Care Veterinary Hospital Inc.		\$24.00	\$1,312.92	N/A	
	Owner	Bright Care Veterinary Hospital Inc.	N/A	N/A	N/A	N/A	
	Veterinary Assistant	Bright Care Veterinary Hospital Inc.		\$26.00	\$2,120.17	N/A	
		Bright Care Veterinary Hospital Inc.	\$2,692.30	N/A	\$2,692.30	N/A	
	Emergency DVM	Bright Care Veterinary Hospital Inc.	\$5,384.61	N/A	\$5,384.62	N/A	
	Veterinary Assistant	Bright Care Veterinary Hospital Inc.		\$27.00	\$2,219.43	N/A	
	Imaging Technician	Bright Care Veterinary Hospital Inc.		\$30.00	\$2,120.70	N/A	
	Veterinary Assistant	Bright Care Veterinary Hospital Inc.		\$30.00	\$300.00	N/A	
	Veterinary Assistant	Bright Care Veterinary Hospital Inc.		\$30.50	\$2,328.80	N/A	
	Veterinary Assistant	Bright Care Veterinary Hospital Inc.		\$29.00	\$2,582.27	N/A	
	Veterinary Assistant	Bright Care Veterinary Hospital Inc.		\$21.00	\$1,735.34	N/A	
	CSR	Bright Care Veterinary Hospital Inc.		\$23.00	\$1,417.61	N/A	
	Veterinary Assistant	Bright Care Veterinary Hospital Inc.		\$32.00	\$2,652.74	N/A	
	CSR	Bright Care Veterinary Hospital Inc.		\$26.00	\$1,832.79	N/A	
	CSR	Bright Care Veterinary Hospital Inc.		\$23.00	\$1,452.73	N/A	
	Hospital Manager	Bright Care Veterinary Hospital Inc.	\$5,000.00	N/A	\$5,000.00	N/A	
	Intern DVM	Bright Care Veterinary Hospital Inc.	\$2,692.30	N/A	\$2,692.30	N/A	
	RVT	Bright Care Veterinary Hospital Inc.		\$39.00	\$3,398.15	N/A	
	Veterinary Assistant	Bright Care Veterinary Hospital Inc.		\$30.00	\$184.50	N/A	
	Veterinary Assistant	Bright Care Veterinary Hospital Inc.		\$34.00	\$2,892.21	N/A	
	Veterinary Assistant	Bright Care Veterinary Hospital Inc.		\$28.00	\$1,659.10	N/A	
	RVT	Bright Care Veterinary Hospital Inc.		\$34.50	\$2,511.06	N/A	

	Veterinary Assistant	Bright Care Veterinary Hospital Inc.		\$34.00	\$1,563.04	N/A
	Internal Medicine DVM	Bright Care Veterinary Hospital Inc.	\$11,538.46	N/A	\$11,538.47	N/A
	RVT	Bright Care Veterinary Hospital Inc.		\$31.50	\$2,739.37	N/A
	RVT	Bright Care Veterinary Hospital Inc.		\$32.50	\$1,677.39	N/A
	Doctor Assistant	Bright Care Veterinary Hospital Inc.		\$25.00	\$1,995.13	N/A
	Interim Hospital Manager	Bright Care Veterinary Hospital Inc.	\$961.53	N/A	\$961.54	N/A
	CSR	Bright Care Veterinary Hospital Inc.		\$24.00	\$2,022.78	N/A
	Emergency DVM	Bright Care Veterinary Hospital Inc.	\$12,019.23	N/A	\$12,019.23	N/A
	Veterinary Assistant	Bright Care Veterinary Hospital Inc.		\$27.00	\$1,727.09	N/A
	CSR	Bright Care Veterinary Hospital Inc.		\$24.00	\$1,592.26	N/A
	Veterinary Assistant	Bright Care Veterinary Hospital Inc.		\$37.00	\$1,805.86	N/A
	RVT Supervisor	Bright Care Veterinary Hospital Inc.		\$34.00	\$3,187.19	N/A
	Doctor's Assistant	Bright Care Veterinary Hospital Inc.		\$25.00	\$2,097.75	N/A
	Veterinary Assistant	Bright Care Veterinary Hospital Inc.		\$27.00	\$1,972.52	N/A
	Veterinary Assistant	Bright Care Veterinary Hospital Inc.		\$30.50	\$1,811.36	N/A
	CSR	Bright Care Veterinary Hospital Inc.		\$22.00	\$1,276.51	N/A
	Veterinary Assistant	Bright Care Veterinary Hospital Inc.		\$32.00	\$640.00	N/A
	Doctor's Assistant	Bright Care Veterinary Hospital Inc.		\$27.00	\$2,305.56	N/A
	Veterinary Assistant	Bright Care Veterinary Hospital Inc.		\$26.00	\$2,612.61	N/A
	Neurologist	Bright Care Veterinary Hospital Inc.	\$2,596.14	N/A	\$2,596.15	N/A
	CSR	Bright Care Veterinary Hospital Inc.		\$24.00	\$1,850.24	N/A
	Veterinary Assistant	Bright Care Veterinary Hospital Inc.		\$25.00	\$2,088.30	N/A
	Veterinary Assistant	Bright Care Veterinary Hospital Inc.		\$24.00	\$1,421.92	N/A
	Assistant Hospital Manager	Bright Care Veterinary Hospital Inc.	\$3,230.76	N/A	\$3,230.77	N/A
	Surgeon	Bright Care Veterinary Hospital Inc.	\$9,615.38	N/A	\$9,615.38	N/A
	Veterinary Assistant	Bright Care Veterinary Hospital Inc.		\$23.00	\$1,900.45	N/A
	Doctor's Assistant	Bright Care Veterinary Hospital Inc.		\$29.00	\$2,579.13	N/A
	CSR	Bright Care Veterinary Hospital Inc.		\$23.00	\$2,162.00	N/A
	Veterinary Assistant	Bright Care Veterinary Hospital Inc.		\$27.00	\$2,315.06	N/A
	Emergency DVM	Bright Care Veterinary Hospital Inc.	\$7,692.30	N/A	\$7,692.32	N/A
	Emergency DVM	Bright Care Veterinary Hospital Inc.	\$9,423.08	N/A	\$9,423.08	N/A

Bright Care Veterinary Group Inc.

EMPLOYEE NAME	Title	Location	By-Weekly SALARY RATE	Hourly Rate	Wages Due at next payroll	Commissions/Bonuses (if any)	Expenses (if any)
	Veterinary Assistant	Bright Care Veterinary Group Inc.		\$25.00	\$382.84	N/A	
	Veterinary Assistant	Bright Care Veterinary Group Inc.		\$27.00	\$2,271.60	N/A	
	Veterinary Assistant	Bright Care Veterinary Group Inc.		\$29.00	\$2,410.34	N/A	
	Veterinary Assistant	Bright Care Veterinary Group Inc.		\$23.50	\$118.97	N/A	
	Emergency DVM	Bright Care Veterinary Group Inc.	\$7,307.69		\$7,307.70	N/A	
	Lead RVT	Bright Care Veterinary Group Inc.		\$28.00	\$2,055.54	N/A	
	RVT	Bright Care Veterinary Group Inc.		\$31.00	\$2,438.62	N/A	
	Lead RVT	Bright Care Veterinary Group Inc.		\$33.00	\$2,648.93	N/A	
	Veterinary Assistant	Bright Care Veterinary Group Inc.		\$26.00	\$2,035.73	N/A	
	RVT	Bright Care Veterinary Group Inc.		\$32.00	\$365.60	N/A	
	Veterinary Assistant	Bright Care Veterinary Group Inc.		\$24.00	\$1,647.72	N/A	
	Assistant Hospital Manager	Bright Care Veterinary Group Inc.	\$3,076.92		\$3,076.92	N/A	
	Doctor's Assistant	Bright Care Veterinary Group Inc.		\$27.00	\$2,143.82	N/A	
	RVT	Bright Care Veterinary Group Inc.		\$30.00	\$1,801.35	N/A	
	Owner	Bright Care Veterinary Group Inc.	\$4,423.08		\$1,828.11	N/A	
	Veterinary Assistant	Bright Care Veterinary Group Inc.		\$24.00	\$92.88	N/A	
	Emergency DVM	Bright Care Veterinary Group Inc.	\$8,076.90		\$8,076.90	N/A	
	Emergency DVM	Bright Care Veterinary Group Inc.	\$7,038.46		\$7,038.46	N/A	
	Doctor's Assistant	Bright Care Veterinary Group Inc.		\$24.50	\$1,565.80	N/A	
	RVT	Bright Care Veterinary Group Inc.		\$24.00	\$2,049.72	N/A	
	Imaging Technician	Bright Care Veterinary Group Inc.		\$30.00	\$690.58	N/A	
	CSR Manager	Bright Care Veterinary Group Inc.		\$27.00	\$2,260.59	N/A	
	Veterinary Assistant	Bright Care Veterinary Group Inc.		\$31.00	\$2,100.47	N/A	
	CSR	Bright Care Veterinary Group Inc.		\$23.00	\$343.18	N/A	
	CSR	Bright Care Veterinary Group Inc.		\$21.50	\$0.00	N/A	
	Kennel Assistant	Bright Care Veterinary Group Inc.		\$17.50	\$1,530.64	N/A	
	Veterinary Assistant	Bright Care Veterinary Group Inc.		\$26.00	\$194.33	N/A	
	Veterinary Assistant	Bright Care Veterinary Group Inc.		\$20.00	\$731.10	N/A	
	Lead Technician	Bright Care Veterinary Group Inc.		\$26.50	\$1,986.62	N/A	
	Veterinary Assistant	Bright Care Veterinary Group Inc.		\$32.00	\$2,743.38	N/A	
	Hospital Manager	Bright Care Veterinary Group Inc.	\$4,096.15		\$4,596.15	N/A	
	CSR	Bright Care Veterinary Group Inc.		\$23.50	\$2,395.94	N/A	
	RVT	Bright Care Veterinary Group Inc.		\$35.00	\$634.20	N/A	
	Emergency DVM	Bright Care Veterinary Group Inc.		\$100.00	\$2,770.00	N/A	
	Veterinary Assistant	Bright Care Veterinary Group Inc.		\$24.00	\$2,216.44	N/A	
	Kennel Assistant	Bright Care Veterinary Group Inc.		\$17.50	\$1,152.03	N/A	
	Neurology Technician	Bright Care Veterinary Group Inc.		\$32.00	\$2,518.28	N/A	
	Doctor's Assistant	Bright Care Veterinary Group Inc.		\$25.00	\$2,483.09	N/A	
	CSR Lead	Bright Care Veterinary Group Inc.		\$24.00	\$2,106.60	N/A	
	Neurologist	Bright Care Veterinary Group Inc.	\$7,788.42		\$7,788.42	N/A	
	CSR	Bright Care Veterinary Group Inc.		\$22.00	\$827.30	N/A	
J	Veterinary Assistant	Bright Care Veterinary Group Inc.		\$19.00	\$1,213.02	N/A	
	Veterinary Assistant	Bright Care Veterinary Group Inc.		\$28.00	\$1,823.50	N/A	
	RVT	Bright Care Veterinary Group Inc.		\$28.00	\$0.00	N/A	

	Doctor's Assistant	Bright Care Veterinary Group Inc.		\$26.00	\$0.00	N/A
	RVT	Bright Care Veterinary Group Inc.		\$27.00	\$481.41	N/A
	Veterinary Assistant	Bright Care Veterinary Group Inc.		\$18.00	\$1,571.31	N/A

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 2818 La Cienega Avenue, Los Angeles, CA 90034.

A true and correct copy of the foregoing document entitled: **Omnibus Declaration Of Alireza Gorgi In Support Of Emergency Motions** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **April 8, 2025**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- David B Golubchik dbg@lnbyg.com, dbg@lnbyg.com
- Kenneth Miskin Kenneth.M.Miskin@usdoj.gov
- United States Trustee (SA) ustpreion16.sa.ecf@usdoj.gov

2. SERVED BY UNITED STATES MAIL: On **April 8, 2025**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

None.

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **April 8, 2025**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

VIA PERSONAL DELIVERY

Honorable Scott C. Clarkson
USBC Central District of California
Ronald Reagan Federal Building and Courthouse
411 West Fourth Street, Suite 5130 / Courtroom 5C
Santa Ana, CA 92701-4593

VIA OVERNIGHT MAIL

☒ Service list attached

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

April 8, 2025

Rebecka Merritt

/s/ Rebecka Merritt

Date

Type Name

Signature

Label Matrix for local noticing

0973-8

Case 8:25-bk-10900-SC

Central District of California

Santa Ana

Tue Apr 8 17:35:51 PDT 2025

AFA

700 Canal St, 1st Floor

Stamford, CT 06902-5921

Anaheim Utilities

201 S Anaheim Blvd #107

Anaheim, CA 92805-3858

Anthem

21215 Burbank Blvd Suite: 100

Woodland Hills, CA 91367-7091

Atlantis Worldwide LLC

60 EAST 42ND STREET

Ste 4600

New York, NY 10165-0022

BANK OF AMERICA, N.A.

One Independence Center -NC1-001-05

101 N Tryon St.

Charlotte, NC 28246-0100

CC Representative

330 N Brand Blvd

Suite 700

Glendale, CA 91203-2336

CT Corporation System

As Representative

330 N Brand Blvd

Glendale, CA 91203-2308

CT Corporation System

as Representative

330 N. Brand Blvd. Ste. 700

Glendale, CA 91203-2336

CT Corporation System

asRepresentative, 330 N. Brand Blvd

Glendale, CA 91203-2308

California Dept. of Tax and

Fee Administration

PO Box 942879

Sacramento, CA 94279-0001

Core Funding Source LLC

49 Front St, Suite 6

Rockville Centre, NY 11570-4044

Corporation Service Company

As Representative, P.O. Box 2576

Springfield, IL 62708-2576

Cox

Box 53249

Phoenix, AZ 85072-3249

Creekridge Capital

7808 Creekridge Circle

Suite 250

Minneapolis, MN 55439-2647

DLP FUNDING, LLC

101 LAKE SHORE DR

Monticello, NY 12701-4006

Daytona Funding Solutions Corp

266 Broadway STE 401

Brooklyn, NY 11211-6306

Dependance Platinum FL LLC

633 167th St

Miami, FL 33162-2442

Employment Development Department

722 Capitol Mall

Sacramento, CA 95814-4703

Employment Development Department

Bankruptcy Group MIC 92E

P.O. Box 826880

Sacramento, CA 94280-0001

Envision Capital Group LLC

29982 Ivy Glenn Dr Fl 1

Laguna Niguel, CA 92677-2097

EverBank

10 Waterview Blvd, 2nd floor

Parsippany, NJ 07054-1286

Everbank, N.A.

10 Waterview Blvd,

Parsippany, NJ 07054-1286

Family Funding Group LLC

1021 H St,

Brooklyn, NY 11219

(p)FIRST INSURANCE FUNDING

450 SKOKIE BLVD SUITE 1000

NORTHBROOK IL 60062-7917

Fora Financial

1385 Broadway, 15th Floor

New York, NY 10018-6015

Funding Futures LLC

100 MERRICK RD SUITE 419E

Rockville Centre, NY 11570-4800

Human Interest

2675 W 600 N, Suite 200

Lindon, UT 84042-1262

IFPS Corporation
3 Hutton Centre Drive
Ste 630
Santa Ana, CA 92707-8747

Internal Revenue
P. O. Box 7346
Philadelphia, PA 19101-7346

JRG Funding LLC
180 Maiden Lane
New York, NY 10038-4925

Johnson & Johnson Finance
Corporation
501 George Street
New Brunswick, NJ 08901-1161

Launch Funding Group LLC
1250 E Hallandale Beach Blvd.
STE 505
Hallandale, FL 33009-4635

Legacy Capital 26, LLC
290 Harbor Dr
Stamford, CT 06902-8700

Live Oak Banking Company
1741 Tiburon Drive
Wilmington, NC 28403-6244

MNY Capital
244 Madison Ave, Suite 1035
New York, NY 10016-2817

MWI
3041 W. Pasadena Dr.
Boise, ID 83705-4776

Midwest Veterinary Supply
21467 Holyoke Ave
Lakeville, MN 55044-7303

NewLane Finance
123 S. Broad St, 17th Floor
Philadelphia, PA 19109-1032

Only Cremations and Aquamation
4263 Birch Street
Newport Beach, CA 92660-1908

Patterson Veterinary
PO BOX 1418
Loveland, CO 80539-1418

Roseen Builders
24 Hammond
Irvine, CA 92618-1680

Slate Funding
15 America Ave Suite 303
Lakewood, NJ 08701-4582

Spring Funding
200 Centra Ave
Farmingdale, NJ 07727-3788

Stage Funding
2360 Lakewood Rd
Toms River, NJ 08755-1929

State of California Franchise Tax
Board
PO Box 942857
Sacramento, CA 94257-0001

TIAA, FSB
10 Waterview Blvd.,
Parsippany, NJ 07054-1286

Thoro Corp
800 SE 4th Ave
Hallandale, FL 33009-6473

Thoro Corp
800 SE 4th Ave
Suite 601
Hallandale Beach, FL 33009-6494

(p)U S SMALL BUSINESS ADMINISTRATION
312 N SPRING ST 5TH FLOOR
LOS ANGELES CA 90012-4701

U.S. Trustee - Santa Ana
411 West Fourth Street
Suite 9041
Santa Ana, CA 92701-8000

United States Trustee (SA)
411 W Fourth St., Suite 7160
Santa Ana, CA 92701-4500

VState Filings
as the Representative
301 Mill Rd, STE U-5
Hewlett, NY 11557-1232

Veterinary Internal Medicine &
Imaging Inc.
2010 Clark Ln, Unit B
Redondo Beach, CA 90278-4206

(p)BENEFICIAL BANK
ATTN BANKRUPTCY
1818 MARKET STREET
8TH FLR
PHILADELPHIA PA 19103-3610

Wilmington Savings Fund Society FSB
1818 Market Street
Philadelphia, PA 19103-3638

David B Golubchik
Levene, Neale, Bender, Yoo & Golubchik L
2818 La Cienega Avenue
Los Angeles, CA 90034-2618

Robert Carrasco
Levene, Neale, Bender, Yoo & Golubchik L
2818 La Cienega Avenue
Los Angeles, CA 90034-2618

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

First Insurance Funding
450 Skokie Blvd
Ste 1000
Northbrook, IL 60062

U.S. Small Business Administration
Office of General Counsel
312 North Spring Street, 5th Floor
Los Angeles, CA 90012

WSFS Bank
1818 Market Street
Philadelphia, PA 19103

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)Corporation Service Company
As Representative, PO Box 2576
Springfield, IL 62708-2576

End of Label Matrix	
Mailable recipients	59
Bypassed recipients	1
Total	60

Label Matrix for local noticing
0973-8
Case 8:25-bk-10902-SC
Central District of California
Santa Ana
Tue Apr 8 17:37:37 PDT 2025

AFA
700 Canal St, 1st Floor
Stamford, CT 06902-5921

Anthem
21215 Burbank Blvd Suite: 100
Woodland Hills, CA 91367-7091

Atlantis Worldwide LLC
60 EAST 42ND STREET
Ste 4600
New York, NY 10165-0022

Bank of America, N.A.
One Independence Center -NC1-001-05
101 N Tryon St.
Charlotte, NC 28246-0100

CC Representative
330 N Brand Blvd
Suite 700
Glendale, CA 91203-2336

CT Corporation System
As Representative
330 N Brand Blvd
Glendale, CA 91203-2308

CT Corporation System
as Representative
330 N. Brand Blvd. Ste. 700
Glendale, CA 91203-2336

CT Corporation System
asRepresentative, 330 N. Brand Blvd
Glendale, CA 91203-2308

California Dept. of Tax and
Fee Administration
PO Box 942879
Sacramento, CA 94279-0001

Core Funding Source LLC
49 Front St, Suite 6
Rockville Centre, NY 11570-4044

Corporation Service Company
As Representative, P.O. Box 2576
Springfield, IL 62708-2576

Cox
Box 53249
Phoenix, AZ 85072-3249

Creekridge Capital
7808 Creekridge Circle
Suite 250
Minneapolis, MN 55439-2647

DLP FUNDING, LLC
101 LAKE SHORE DR
Monticello, NY 12701-4006

Daytona Funding Solutions Corp
266 Broadway STE 401
Brooklyn, NY 11211-6306

Dependance Platinum FL LLC
633 167th St
Miami, FL 33162-2442

Employment Development Department
Bankruptcy Group MIC 92E
P.O. Box 826880
Sacramento, CA 94280-0001

Employment Development Dept.
P.O. Box 826880
Sacramento, CA 94280-0001

Envision Capital Group LLC
29982 Ivy Glenn Dr Fl 1
Laguna Niguel, CA 92677-2097

EverBank
10 Waterview Blvd, 2nd floor
Parsippany, NJ 07054-1286

Everbank, N.A.
10 Waterview Blvd,
Parsippany, NJ 07054-1286

Family Funding Group LLC
1021 H St,
Brooklyn, NY 11219

(p)FIRST INSURANCE FUNDING
450 SKOKIE BLVD SUITE 1000
NORTHBROOK IL 60062-7917

Fora Financial
1385 Broadway, 15th Floor
New York, NY 10018-6015

Funding Futures LLC
100 MERRICK RD SUITE 419E
Rockville Centre, NY 11570-4800

Human Interest
2675 W 600 N, Suite 200
Lindon, UT 84042-1262

IFPS Corporation
3 Hutton Centre Drive
Ste 630
Santa Ana, CA 92707-8747

Internal Revenue Service
P.O. Box 7346
Philadelphia, PA 19101-7346

NRG Funding LLC
180 Maiden Lane
New York, NY 10038-4925

Legacy Capital 26, LLC
290 Harbor Dr
Stamford, CT 06902-8700

Live Oak Banking Company
1741 Tiburon Drive
Wilmington, NC 28403-6244

MNY Capital
244 Madison Ave, Suite 1035
New York, NY 10016-2817

MWI
3041 W. Pasadena Dr.
Boise, ID 83705-4776

Midwest Veterinary Supply
21467 Holyoke Ave
Lakeville, MN 55044-7303

NewLane Finance
123 S. Broad St, 17th floor
Philadelphia, PA 19109-1032

Only Cremations and Aquamation
4263 Birch Street
Newport Beach, CA 92660-1908

Orange County Tax Collector
Bankruptcy Unit
P.O. Box 1438
Santa Ana, CA 92702-1438

Patterson Veterinary
PO BOX 1418
Loveland, CO 80539-1418

(p)SDG&E
PO BOX 25111
SANTA ANA CA 92799-5111

Slate Funding
15 America Ave Suite 303
Lakewood, NJ 08701-4582

Spring Funding
200 Centra Ave
Farmingdale, NJ 07727-3788

Stage Funding
2360 Lakewood Rd
Toms River, NJ 08755-1929

State of California Franchise Tax
Board
PO Box 942857
Sacramento, CA 94257-0001

Steven Zakharyayev, PLLC
10 W 37th St, RM 602
New York, NY 10018-7473

TIAA, FSB
10 Waterview Blvd.,
Parsippany, NJ 07054-1286

Thoro Corp
800 SE 4th Ave
Hallandale, FL 33009-6473

Thoro Corp
800 SE 4th Ave
Suite 601
Hallandale Beach, FL 33009-6494

(p)U S SMALL BUSINESS ADMINISTRATION
312 N SPRING ST 5TH FLOOR
LOS ANGELES CA 90012-4701

U.S. Trustee - Santa Ana
411 West Fourth Street
Suite 9041
Santa Ana, CA 92701-8000

United States Trustee (SA)
411 W Fourth St., Suite 7160
Santa Ana, CA 92701-4500

VState Filings
as the Representative
301 Mill Rd, STE U-5
Hewlett, NY 11557-1232

(p)BENEFICIAL BANK
ATTN BANKRUPTCY
1818 MARKET STREET
8TH FLR
PHILADELPHIA PA 19103-3610

David B Golubchik
Levene, Neale, Bender, Yoo & Golubchik L
2818 La Cienega Avenue
Los Angeles, CA 90034-2618

Robert Carrasco
Levene, Neale, Bender, Yoo & Golubchik L
2818 La Cienega Avenue
Los Angeles, CA 90034-2618

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

First Insurance Funding
450 Skokie Blvd
Ste 1000
Northbrook, IL 60062

San Diego Gas and Electric
P.O. Box 25111
Santa Ana, CA 92799

U.S. Small Business Administration
Office of General Counsel
312 North Spring Street, 5th Floor
Los Angeles, CA 90012

WSFS Bank
1818 Market Street
Philadelphia, PA 19103

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)Corporation Service Company
As Representative, PO Box 2576
Springfield, IL 62708-2576

End of Label Matrix	
Mailable recipients	57
Bypassed recipients	1
Total	58